

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: ELIZABETH THOMAS	§	
	§	
	§	
JAMES ALLEN AND ROBERT L THOMAS	§	
Plaintiffs	§	
vs	§	
McCARTHY & HOLTHUS LLP,	§	
ON BEHALF OF FLAGSTONE LENDING	§	
GROUP A NON-EXISTENT A UTAH	§	
CORPORATION, AND	§	Adversary Cause No. 22 AP 03024 Debtor
	§	
SUCCESSOR/ASSIGNEE J.P. MORGAN	§	
CHASE BANK N.A. and ELIZABETH	§	
THOMAS	§	
Defendants	§	
_____	§	
	§	
PRIMARY RESIDENTIAL MORTGAGE INC.	§	
Intervenor/Defendant	§	
vs.	§	
ELIZABETH THOMAS	§	
Defendant	§	

**NOTICE OF VEXATIOUS LITIGANTS ORDER AND SANCTION ORDER
FROM THE HARRIS COUNTY 80TH DISTRICT COURT CAUSE NO. 2020-35780**

TO THE HONORABLE COURT:

COMES NOW Colleen M. McClure, former attorney (having withdrawn from representation on all cases by Harris County District Court Order dated November 1, 2023) for Robert Thomas and James Allen in all consolidated cases (2016-87941, 2017-76078, 2017-82388 and 2018-91506) in Harris County District Court into the 333rd District Court, and withdrawn from representing Robert Thomas and James Allen in the above

entitled and numbered cause, and hereby provides the Court notice of the Court Orders from the 80th Judicial District Court, Cause No. 2020-35780, Exhibit “A” dated November 16, 2023 and Exhibit “B” dated November 14, 2023, and shows as follows:

1. The Order Declaring Elizabeth Thomas, Robert Thomas, and James Allen, amongst others, vexatious litigants that was based upon lawsuits revolving around the property located at 8202 Terra Valley Lane, Tomball, Texas 77375. The State Court Case under Cause Number 2018-91506, the remanded case in the above entitled and numbered cause, also involves the same property.

2. The 80th District Court, Harris County, Texas has held a hearing, and issued an order finding that Elizabeth Thomas, Robert Thomas, James Allen, and others are deemed to be Vexatious Litigants. See attached Exhibit “A,” November 16, 2023 Order.

3. The Court further found that Elizabeth Thomas has been filing motions, cases, and claims in other people’s names. See attached Exhibit “A,” November 16, 2023 Order.

4. The claims made herein pertain to the same property (8202 Terra Valley Lane, Tomball, Texas 77375) subject to the November 16, 2023 Vexatious Litigants Order.

5. The 80th District Court also found in paragraph 15 of the November 14, 2023 Order (Exhibit “B”) that the “lawsuits and legal actions have been filed to hinder, defraud, and delay Defendant P.C.F. Properties in Tx, LLC’s ability to take possession of the property located at 8202 Terra Valley Lane, Tomball, Texas 77375;” See Exhibit “B”.

Dated: May 31, 2024.

Respectfully submitted,

COLLEEN M. McCLURE
ATTORNEY AT LAW

By: /s/ Colleen M. McClure

COLLEEN M. MCCLURE

Texas Bar No. 24012121

6046 FM 2920, #425

Spring, Texas, 77379

Tel. (281) 440-1625

Fax. (281) 946-5627

colleen.mcclure@att.net

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above foregoing Notice and Request to Take Judicial Notice has been sent to Elizabeth Thomas, Robert Thomas and James Allen via eservice and email on May 31, 2024 and via regular mail.

/s/ Colleen M. McClure

COLLEEN M. MCCLURE